

authorization, coordinated with another individual to remove evidence relating to the creation of counterfeit credit cards and identity theft involving SUYUNOV from an apartment in the vicinity of Miami, Florida, following the arrest of SUYUNOV on or about February 12, 2017.

y. On or about February 27, 2017, DENIS SAVGIR, the defendant, created and attempted to create false identification documents for use by DZHANASHVILI and others in furtherance of the Shulaya Enterprise's counterfeit credit card fraud.

z. On or about February 22, 2017, in the vicinity of Las Vegas, Nevada, a coconspirator ("CC-2") at the direction of DZHANASHVILI, retrieved from a third-party approximately \$1,500 obtained from the use of counterfeit credit cards and stolen personal identifying information.

aa. On or about March 1, 2017, on a telephone call intercepted pursuant to judicial authorization, IVAN AFANASYEV, a/k/a "Vanya," the defendant, requested that DZHANASHVILI oversee a team of lower-level associates of the Shulaya Enterprise who would engage in the use of counterfeit credit cards at local businesses in and around the New York City area.

bb. On or about March 3, 2017, SAVGIR and DZHANASHVILI, on a telephone call intercepted pursuant to judicial authorization, coordinated the creation of approximately thirteen

false identification documents for use by DZHANASHVILI and others in furtherance of the Shulaya Enterprise's counterfeit payment scheme.

cc. On or about March 9, 2017, CC-2, in the vicinity of Brooklyn, New York, at the direction of DZHANASHVILI, attempted to contact and arrange a meeting in Atlantic City, New Jersey, with a target of a robbery scheme ("Victim-1"), in which DZHANASHVILI and CC-2 plotted to drug or otherwise render unconscious their target in order to then remove Victim-1's money and property.

dd. On or about March 9, 2017, ZURAB BUZIASHVILI, the defendant, on a telephone call intercepted pursuant to judicial authorization, instructed DZHANASHVILI regarding the use of gas for the purpose of rendering a person unconscious in furtherance of the robbery scheme orchestrated by DZHANASHVILI and CC-2.

ee. On or about March 21, 2017, on a telephone call intercepted pursuant to judicial authorization, BUZIASHVILI and DZHANASHVILI arranged for the transportation and sale of approximately 10,000 pounds of stolen chocolate confections to a confidential source ("CS-3"), who was negotiating the purchase of stolen goods and firearms at the direction of law enforcement.

ff. On or about March 22, 2017, in the vicinity of Brooklyn, New York, ARSLANOUK accepted \$700 from CS-2 as a down payment for two firearms that ARSLANOUK would transport from

Florida to New York State for purchase by CS-2, a person whom ARSLANOUK knew to be a convicted felon.

gg. On or about March 26, 2017, on a telephone call intercepted pursuant to judicial authorization, DZHANASHVILI and AFANASYEV coordinated the preparation of forged invoices and bills of lading for the purpose of transporting and selling approximately 10,000 pounds of stolen chocolate confections.

hh. On or about March 31, 2017, LOMISHVILI and a co-conspirator ("CC-3"), in Brooklyn, New York, met with CS-3 to coordinate the delivery of approximately 10,000 pounds of stolen chocolate confections, among other stolen items, to CS-3.

ii. On or about April 7, 2017, GABISONIA and UGLAVA, along with others, in the vicinity of Philadelphia, Pennsylvania, executed the Shulaya Enterprise's scheme to defraud casinos by predicting the behavior of particular models of electronic slot machines, and thereby obtained over \$1,000 in proceeds from the manipulation of such machines.

jj. On or about April 10, 2017, SAVGIR and DZHANASHVILI, on a telephone call intercepted pursuant to judicial authorization, coordinated the creation of false identification documents for use by DZHANASHVILI and HOVHANNISYAN, among other others, in furtherance of the Shulaya Enterprise's counterfeit credit card fraud, and arranged for the delivery of those false identification documents to HOVHANNISYAN at a dental office in

Brooklyn, New York.

kk. On or about May 3, 2017, MAKASHVILI and MELMAN, acting at SHULAYA's direction, delivered an electronic "slot" machine and other electronic devices to CS-1 for the purpose of "training" CS-1 to defraud casinos through the use of electronic devices and software designed to predict the behavior of particular models of electronic "slot" machines.

(Title 18, United States Code, Section 1962(d).)

**COUNT TWO**

**(Conspiracy to Commit Offenses Against the United States: Sale and Transport of Stolen Goods)**

The Grand Jury further charges:

12. From at least in or about 2014, up to and including in or about May 2017, in the Southern District of New York and elsewhere, RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," HAMLET UGLAVA, MAMUKA CHAGANAVA, MIKHEIL TORADZE, AVTANDIL KANADASHVILI, ARTUR VINOKUROV, a/k/a "Rizhy," TIMUR SUYUNOV, ZURAB BUZIASHVILI, GIORGI LOMISHVILI, and IVAN AFANASYEV, a/k/a "Vanya," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit offenses against the United States, to wit, to violate Title 18, United States Code, Sections 2314 and 2315.

13. It was a part and an object of the conspiracy that RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," HAMLET UGLAVA, MAMUKA CHAGANAVA, MIKHEIL TORADZE, AVTANDIL KANADASHVILI, ARTUR VINOKUROV, a/k/a "Rizhy," TIMUR SUYUNOV, ZURAB BUZIASHVILI, GIORGI LOMISHVILI, and IVAN AFANASYEV, a/k/a "Vanya," the defendants, and others known and unknown, would and did transport, transmit, and transfer in interstate and foreign commerce any goods, wares, merchandise, securities and money, of the value of \$5,000 and more, knowing the same to have been stolen, converted and taken by fraud, in violation of Title 18, United States Code, Section 2314.

14. It was further a part and an object of the conspiracy that RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," HAMLET UGLAVA, MAMUKA CHAGANAVA, MIKHEIL TORADZE, AVTANDIL KANADASHVILI, ARTUR VINOKUROV, a/k/a "Rizhy," TIMUR SUYUNOV, ZURAB BUZIASHVILI, GIORGI LOMISHVILI, and IVAN AFANASYEV, a/k/a "Vanya," the defendants, and others known and unknown, would and did receive, possess, conceal, store, barter, sell, and dispose of goods, wares, and merchandise, securities, and money of the value of \$5,000 and more, which had crossed a State or United States boundary after being stolen, unlawfully converted, and taken, knowing the same to have been stolen, unlawfully converted, and taken, in violation of Title 18, United States Code, Section 2315.

15. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about December 11, 2014, RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," and MAMUKA CHAGANAVA, the defendants, in Manhattan, New York, negotiated the sale of stolen jewelry to CS-1.

b. On or about March 23, 2015, in Atlantic City, New Jersey, SHULAYA and ZURAB DZHANASHVILI, a/k/a "Zura," the defendants, negotiated for the purchase, and in fact received, cigarettes that SHULAYA and DZHANASHVILI understood to have been stolen from a facility in Virginia.

c. On or about August 9, 2015, SHULAYA and ARTUR VINOKUROV, a/k/a "Rizhy," the defendant, received in the vicinity of Cropsey Avenue, Brooklyn, New York, eleven cases of purportedly stolen cigarettes from CS-1.

d. On or about September 2, 2015, MIKHEIL TORADZE and AVTANDIL KANADASHVILI, the defendants, received, in the vicinity of Bath Avenue, Brooklyn, New York, three cases of purportedly stolen cigarettes from CS-1, and paid CS-1 approximately \$17,800 for purportedly stolen cigarettes previously provided to CHAGANAVA.

e. On or about April 7, 2016, HAMLET UGLAVA, the defendant, and SHULAYA received, in the vicinity of Bay Parkway,



Brooklyn, New York, ten cases of purportedly stolen cigarettes from CS-1.

f. On or about December 14, 2016, DZHANASHVILI and TIMUR SUYUNOV, the defendant, discussed the preparation of falsified bills of lading for use in the transportation and sale of stolen merchandise.

g. On or about March 21, 2017, on a telephone call intercepted pursuant to judicial authorization, ZURAB BUZIASHVILI, the defendant, and DZHANASHVILI arranged for the transportation and sale of approximately 10,000 pounds of stolen chocolate confections to CS-3, who was negotiating the purchase of stolen goods and firearms at the direction of law enforcement.

h. On or about March 26, 2017, on a telephone call intercepted pursuant to judicial authorization, DZHANASHVILI and IVAN AFANASYEV, a/k/a "Vanya," coordinated the preparation of forged invoices and bills of lading for the purpose of transporting and selling approximately 10,000 pounds of stolen chocolate confections.

i. On or about March 31, 2017, LOMISHVILI and CC-3, in Brooklyn, New York, met with CS-3 to coordinate the delivery of approximately 10,000 pounds of stolen chocolate confections, among other stolen items, to CS-3.

(Title 18, United States Code, Section 371.)

COUNT THREE

**(Conspiracy to Commit Offenses Against the United States:  
Trafficking Contraband Tobacco)**

The Grand Jury further charges:

16. From at least in or about 2014, up to and including in or about May 2017, in the Southern District of New York and elsewhere, RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," HAMLET UGLAVA, MAMUKA CHAGANAVA, MIKHEIL TORADZE, AVTANDIL KANADASHVILI, and ARTUR VINOKUROV, a/k/a "Rizhy," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit offenses against the United States, to wit, to violate Title 18, United States Code, Sections 2342.

17. It was a part and an object of the conspiracy that RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," HAMLET UGLAVA, MAMUKA CHAGANAVA, MIKHEIL TORADZE, AVTANDIL KANADASHVILI, and ARTUR VINOKUROV, a/k/a "Rizhy," the defendants, and others known and unknown, would and did ship, transport, receive, possess, sell, distribute, and purchase contraband cigarettes and contraband smokeless tobacco, as defined in Title 18 United States Code, Section 2341, in violation of Title 18, United States Code, Section 2342.



18. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about March 23, 2015, in Atlantic City, New Jersey, SHULAYA and ZURAB DZHANASHVILI, a/k/a "Zura," the defendants, negotiated for the purchase, and in fact received, cigarettes that SHULAYA and DZHANASHVILI understood to have been stolen from a facility in Virginia.

b. On or about August 9, 2015, SHULAYA and ARTUR VINOKUROV, a/k/a "Rizhy," the defendant, in the vicinity of Cropsey Avenue, Brooklyn, New York, received eleven cases of purportedly stolen cigarettes from CS-1.

c. On or about September 2, 2015, MIKHEIL TORADZE and AVTANDIL KANADASHVILI, the defendants, in the vicinity of Bath Avenue, Brooklyn, New York, received three cases of purportedly stolen cigarettes from CS-1, and provided CS-1 with approximately \$17,800 as payment for purportedly stolen cigarettes previously provided to CHAGANAVA.

d. On or about April 7, 2016, in the vicinity of Bay Parkway, Brooklyn, New York, HAMLET UGLAVA, the defendant, and SHULAYA received ten cases of purportedly stolen cigarettes from CS-1.

(Title 18, United States Code, Section 371.)

COUNT FOUR

(Conspiracy to Commit Fraud Relating to Identification Documents)

The Grand Jury further charges:

19. From at least in or about January 2017, up to and including in or about May 2017, in the Southern District of New York and elsewhere, RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," TIMUR SUYUNOV, IVAN AFANASYEV, a/k/a "Vanya," DENIS SAVGIR, VACHE HOVHANNISYAN, DENYS DAVYDOV, EREKLE KERESSELIDZE, and ALEX MITSELMAKHER, a/k/a "Globus," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Sections 1028(a)(1), 1028(a)(2), 1028(a)(3), 1028(a)(7), and 1028(a)(8).

20. It was a part and an object of the conspiracy that RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," TIMUR SUYUNOV, IVAN AFANASYEV, a/k/a "Vanya," DENIS SAVGIR, VACHE HOVHANNISYAN, DENYS DAVYDOV, EREKLE KERESSELIDZE, and ALEX MITSELMAKHER, a/k/a "Globus," the defendants, and others known and unknown, knowingly and without lawful authority would and did produce an identification document, authentication feature, and a false identification document, in violation of Title 18, United States Code, Section 1028(a)(1).

21. It was further a part and an object of the conspiracy that RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," TIMUR SUYUNOV, IVAN AFANASYEV, a/k/a "Vanya," DENIS SAVGIR, VACHE HOVHANNISYAN, DENYS DAVYDOV, EREKLE KERESSELIDZE, and ALEX MITSELMAKHER, a/k/a "Globus," the defendants, and others known and unknown, knowingly would and did transfer an identification document, authentication feature, and a false identification document knowing that such document and feature was stolen and produced without lawful authority, in violation of Title 18, United States Code, Section 1028(a)(2).

22. It was further a part and an object of the conspiracy that RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," TIMUR SUYUNOV, IVAN AFANASYEV, a/k/a "Vanya," DENIS SAVGIR, VACHE HOVHANNISYAN, DENYS DAVYDOV, EREKLE KERESSELIDZE, and ALEX MITSELMAKHER, a/k/a "Globus," the defendants, and others known and unknown, knowingly would and did possess with intent to use unlawfully and transfer unlawfully five and more identification documents (other than those issued lawfully for the use of the possessor), authentication features, and false identification documents, in violation of Title 18, United States Code, Section 1028(a)(3).

23. It was further a part and an object of the conspiracy that RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," TIMUR SUYUNOV, IVAN AFANASYEV,

a/k/a "Vanya," DENIS SAVGIR, VACHE HOVHANNISYAN, DENYS DAVYDOV, EREKLE KERESSELIDZE, and ALEX MITSELMAKHER, a/k/a "Globus," and others known and unknown, knowingly would and did transfer, possess, and use, without lawful authority, a means of identification of another person with the intent to commit, and to aid and abet, and in connection with, any unlawful activity that constitutes a violation of Federal law, and that constitutes a felony under any applicable State and local law, in violation of Title 18, United States Code, Section 1028(a)(7).

24. It was further a part and an object of the conspiracy that RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," TIMUR SUYUNOV, IVAN AFANASYEV, a/k/a "Vanya," DENIS SAVGIR, VACHE HOVHANNISYAN, DENYS DAVYDOV, EREKLE KERESSELIDZE, and ALEX MITSELMAKHER, a/k/a "Globus," the defendants, and others known and unknown, knowingly would and did traffic in false and actual authentication features for use in false identification documents, document-making implements, and means of identification, in violation of Title 18, United States Code, Section 1028(a)(8).

(Title 18, United States Code, Section 1028(f).)

COUNT FIVE

(Wire Fraud Conspiracy)

The Grand Jury further charges:

25. From at least in or about September 2016, up to and including in or about May 2017, in the Southern District of New York and elsewhere, RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," AKAKI UBILAVA, a/k/a "Ako," HAMLET UGLAVA, EVGHENI MELMAN, DIEGO GABISONIA, and LEVAN MAKASHVILI, the defendants, and others known and unknown, knowingly and willfully did combine, conspire, confederate and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1343.

26. It was a part and an object of the conspiracy that RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," AKAKI UBILAVA, a/k/a "Ako," HAMLET UGLAVA, EVGHENI MELMAN, DIEGO GABISONIA, and LEVAN MAKASHVILI, the defendants, and others known and unknown, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and attempting to do so, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section

1343, to wit, a scheme to defraud casinos through the use of electronic devices and software designed to predict the behavior of particular models of electronic "slot" machines, thereby removing the element of chance from play of those machines.

(Title 18, United States Code, Section 1349.)

**COUNT SIX**

**(Narcotics Conspiracy)**

The Grand Jury further charges:

27. From at least in or about November 2015, through at least in or about May 2017, in the Southern District of New York and elsewhere, GIORGI LOMISHVILI, BAKAI MARAT-UULU, and ANDRIY PETRUSHYN, the defendants, and others known and unknown, knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

28. It was a part and an object of the conspiracy that GIORGI LOMISHVILI, BAKAI MARAT-UULU, and ANDRIY PETRUSHYN, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

29. The controlled substance involved in the offense was (1) 500 grams and more of mixtures and substances containing a detectable amount of cocaine; and (2) 100 grams and more of mixtures and substances containing a detectable amount of heroin, in



violation of Title 21 United States Code, Section 841(a)(1) and 841(b)(1)(B).

(Title 21, United States Code, Section 846.)

**COUNT SEVEN**

**(Obstruction of Justice)**

The Grand Jury further charges:

30. On or about October 26, 2016, in the Southern District of New York and elsewhere, YURIY LERNER, the defendant, in a matter within the jurisdiction of the executive, legislative, and judicial branch of the Government of the United States, knowingly and willfully, would and did falsify, conceal, and cover up by a trick, scheme, and device a material fact, and make a materially false, fictitious, and fraudulent statement and representation, to wit, LERNER, lied to agents of the Federal Bureau of Investigation ("FBI") regarding information provided by LERNER to members of the Shulaya Enterprise pertaining to the FBI's investigation of the Shulaya Enterprise.

(Title 18, United States Code, Section 1001.)

**FORFEITURE ALLEGATIONS AND SUBSTITUTE ASSET PROVISION**

**FORFEITURE ALLEGATION AS TO COUNT ONE**

31. As a result of committing the offense alleged in Count One of this Indictment, RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," AKAKI UBILAVA, a/k/a "Ako," HAMLET UGLAVA, MAMUKA CHAGANAVA, MIKHEIL TORADZE,

NAZO GAPRINDASHVILI, a/k/a "Anna," ARTUR VINOKUROV, a/k/a "Rizhy,"  
 EVGHENI MELMAN, TIMUR SUYUNOV, ZURAB BUZIASHVILI, GIORGI  
 LOMISHVILI, AZER ARSLANOUK, IVAN AFANASYEV, a/k/a "Vanya," DENIS  
 SAVGIR, DIEGO GABISONIA, LEVAN MAKASHVILI, SEMYON SARAIDAROV,  
 a/k/a "Sammy," and VACHE HOVHANNISYAN, the defendants, shall  
 forfeit to the United States, pursuant to Title 18, United States  
 Code, Section 1963,

a. any interest acquired or maintained in  
 violation of Title 18, United States Code, Section 1962, as charged  
 in Count One;

b. any interest in, security of, claim against,  
 or property or contractual right of any kind affording a source of  
 influence over, any enterprise established, operated, controlled,  
 conducted, or participated in the conduct in violation of Title  
 18, United States Code, Section 1962, as charged in Count One; and

c. any property constituting, or derived from,  
 any proceeds obtained, directly or indirectly, from racketeering  
 activity in violation of Title 18, United States Code, Section  
 1962, as charged in Count One.

**FORFEITURE ALLEGATION AS TO COUNT TWO**

32. As a result of committing the offense charged in  
 Count Two of this Indictment, RAZHDEN SHULAYA, a/k/a "Brother,"  
 a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," HAMLET UGLAVA,  
 MAMUKA CHAGANAVA, MIKHEIL TORADZE, ARTUR VINOKUROV, a/k/a "Rizhy,"

TIMUR SUYUNOV, ZURAB BUZIASHVILI, GIORGI LOMISHVILI, and IVAN AFANASYEV, a/k/a "Vanya," the defendants, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461, any and all property, real or personal, that constitutes or is derived from proceeds traceable to the commission of the offense charged in Count Two of this Indictment.

**FORFEITURE ALLEGATION AS TO COUNT THREE**

33. As a result of committing the offense charged in Count Three of this Indictment, RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," HAMLET UGLAVA, MAMUKA CHAGANAVA, MIKHEIL TORADZE, and ARTUR VINOKUROV, a/k/a "Rizhy," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any and all property, real or personal, that constitutes or is derived from proceeds traceable to the commission of the offense charged in Count Three of this Indictment.

**FORFEITURE ALLEGATION AS TO COUNT FOUR**

34. As a result of committing the offense charged in Count Four of this Indictment, RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," ZURAB DZHANASHVILI, a/k/a "Zura," TIMUR SUYUNOV, IVAN AFANASYEV, a/k/a "Vanya," DENIS SAVGIR, VACHE HOVHANNISYAN, and DENYS DAVYDOV, the defendants, shall forfeit to the United

States, pursuant to Title 18, United States Code, Section 982(a)(2), any property constituting, or derived from, proceeds obtained directly or indirectly as the result of such violation.

**FORFEITURE ALLEGATION AS TO COUNT FIVE**

35. As a result of committing the offense charged in Count Five of this Indictment, RAZHDEN SHULAYA, a/k/a "Brother," a/k/a "Roma," AKAKI UBILAVA, a/k/a "Ako," HAMLET UGLAVA, EVGHENI MELMAN, DIEGO GABISONIA, and LEVAN MAKASHVILI, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, any and all property, real or personal, that constitutes or is derived from proceeds traceable to the commission of the offense charged in Count Five of this Indictment.

**FORFEITURE ALLEGATION AS TO COUNT SIX**

36. As a result of committing the offense charged in in Count Six of this Indictment, GIORGI LOMISHVILI, BAKAI MARAT-UULU, and ANDRIY PETRUSHYN, the defendants, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained directly or indirectly as a result of the offense alleged in Count Six, and any property used or intended to be used in any manner or part to commit or facilitate the commission of the offense charged in Count Six of this Indictment.

Substitute Asset Provision

37. If any of the above described forfeitable property, as a result of any act or omission of the defendants:

a. Cannot be located upon the exercise of due diligence;

b. Has been transferred or sold to, or deposited with, a third person;

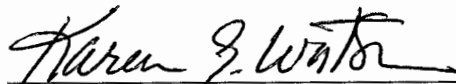
c. Has been placed beyond the jurisdiction of the Court;

d. Has been substantially diminished in value; or

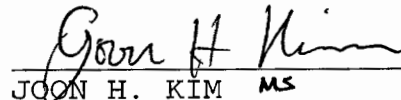
e. Has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 1963(m) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property.

(Title 18, United States Code, Sections 492, 981(a)(1)(C), 982(a)(2), and 1963, and Title 21, United States Code, Section 853, and Title 28, United States Code, Section 2461.)



FOREPERSON



JOON H. KIM <sup>MS</sup>  
Acting United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

RAZHDEN SHULAYA, a/k/a "Brother," a/k/a  
"Roma," ZURAB DZHANASHVILI, a/k/a  
"Zura," AKAKI UBILAVA, a/k/a "Ako,"  
HAMLET UGLAVA, MAMUKA CHAGANAVA, MIKHEIL  
TORADZE, AVTANDIL KANADASHVILI, NAZO  
GAPRINDASHVILI, a/k/a "Anna," ARTUR  
VINOKUROV, a/k/a "Rizhy," EVGHENI  
MELMAN, TIMUR SUYUNOV, ZURAB  
BUZIASHVILI, GIORGI LOMISHVILI AZER  
ARSLANOUK, IVAN AFANASYEV, a/k/a  
"Vanya," DENIS SAVGIR  
BAKAI MARAT-UULU, ANDRIY PETRUSHYN,  
DIEGO GABISONIA, LEVAN MAKASHVILI,  
SEMYON SARAIDAROV, a/k/a "Sammy," VACHE  
HOVHANNISYAN, DENYS DAVYDOV, EREKLE  
KERESSELIDZE, ALEX MITSELMAKHER, a/k/a  
"Globus," YURIY LERNER, a/k/a "Yuri,"

Defendants.

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SEALED INDICTMENT

17 Cr.

(18 U.S.C. §§ 1962, 1349, 1028, 1001,  
371 and 2; 21 U.S.C. § 846.)

JOON H. KIM

Acting United States Attorney.

A TRUE BILL



Foreperson.

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6/6/17. Filed Sealed Indictment  
cc Alw issued J Pitman  
USMJ